

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
	)	<b>Case No. 3:19cr130</b>
	)	
<b>OKELLO T. CHATRIE,</b>	)	
<b>Defendant</b>	)	

**DEFENDANT’S MOTION FOR LEAVE TO FILE BRIEF EXCEEDING 30 PAGES**

Defendant, Okello T. Chatrie, by counsel, hereby moves for leave to file its opening Hearing Brief in Support of Okello Chatrie’s Motion to Suppress Evidence Obtained from a “Geofence” General Warrant, appended hereto as Exhibit 1, despite it exceeding the presumptive 30 page limit on opening briefs found in Local R. 47(F)(3), on the following grounds:

The suppression motion has a long history. It was filed in October 2019, but the Court has since then received voluminous information from the parties, Google, and other witnesses concerning the “Geofence” warrants at issue here, in written form and in testimony during hearings in March 2021, that took up every bit of two days. The motion deals with issues of great factual and legal complexity as well as importance. That recognition prompted the parties and the Court to agree upon an extended briefing schedule for supplemental briefing, tagged to the production of the transcripts of last month’s hearings.

Defendant’s opening post-hearing brief as attached exceeds 30 pages. Having said that, about 5 of those pages reflect scant text, but rather images of relevant documents from the record, which counsel thought more useful inserted into the text of the brief, than merely appended as separate exhibits. In addition, counsel notes that a comparable appellate rule treats the 30-page limit on opening briefs and responses as satisfied by a brief of up to 13,000 words, even if it exceeds 30 pages. *See* Fed. R. App. P. 28(e)(1) and (e)(2)(A)(i). The brief as filed does not exceed

